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11  
12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN FRANCISCO DIVISION

15 JOSHUA GERSTEIN, ) Case No. C 06-04643 MMC  
16 Plaintiff, )  
17 v. )  
18 CENTRAL INTELLIGENCE AGENCY, )  
19 et al., )  
20 Defendant. )  
21

**STIPULATION TO EXTEND  
BRIEFING DEADLINES; ORDER**

22 The parties hereby stipulate to a one-week extension of the briefing deadlines set pursuant  
23 to the Court's August 30, 2007 Order. The bases for this stipulation are as follows:

24 1. Pursuant to the August 30 Order, defendants' reply in support of their motion for partial  
25 summary judgment (addressing issues regarding the agencies' searches for documents responsive  
26 to plaintiff's requests under the Freedom of Information Act (FOIA), 5 U.S.C. § 552, and the  
27 exemptions applied to withhold responsive information in non-case or non-investigation specific  
28 documents) is due to be filed on October 19, 2007; plaintiff's reply in support of his cross motion

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for partial summary judgment is to be filed on November 2, 2007; and a hearing on the pending motions is scheduled for November 30, 2007.

2. On September 26, 2007, defendants' counsel received copies of plaintiff's Opposition to Defendants' Motion for Partial Summary Judgment, Cross Motion for Partial Summary Judgment against defendant Department of Justice, Motion for In Camera Review and Limited Discovery, and Motion for More Definite Statement from Defendant NSA Regarding Scope of Search. Since being served with these papers, two hearings were scheduled in one of defendants' counsel's other cases, both of which required preparation of documents and related materials as well as travel from Washington, D.C., first to Reno, Nevada from October 10-12, 2007 and then to Los Angeles, California from October 17-19, 2007. Due to these events, which were unforeseen at the time the current briefing schedule was entered, defendants' counsel requires a one-week extension of time, or until October 26, 2007, to prepare a reply in support of the defendants' motion for partial summary judgment and oppositions to plaintiff's various motions.

3. Plaintiff stipulates to the request for a one-week extension of time for defendants to file their papers. The parties also stipulate to shift the other briefing deadline accordingly, from the current deadline of November 2 to November 9, 2007.

Accordingly, the parties stipulate to extend the briefing deadlines by one week.

Respectfully submitted,

JOSHUA GERSTEIN



Plaintiff

PETER D. KEISLER  
Assistant Attorney General



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Federal Programs Branch

Dated: October 16, 2007

Dated: October 16, 2007

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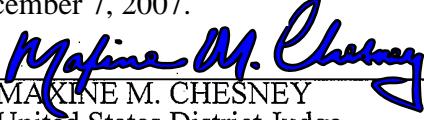
{PROPOSED} ORDER

1       Upon consideration of the parties' stipulation, the briefing deadlines set by the August 30,  
2 2007 Order are extended by one week, to reflect the following deadlines: October 26, 2007 for  
3 defendants' Reply in Support of its Motion for Partial Summary Judgment and to respond to  
4 plaintiff's motions filed with the court on September 22, 2007; and November 9, 2007, for  
5 plaintiff's Reply in Support of Cross Motion for Partial Summary Judgment and in support of his  
6 other pending motions.

7       PURSUANT TO STIPULATION, IT IS SO ORDERED.

8       It is further ORDERED that the hearing on the pending motions for summary judgment is  
continued from November 30, 2007 to December 7, 2007.

9       Dated: October 22, 2007

10         
MAXINE M. CHESNEY  
United States District Judge